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December 12, 2024

Honorable James R. Cho
U.S. District Court Judge
Eastern District of New York
225 Cadman Plaza E,
Brooklyn, NY 11201

Re: Carlos Ruiz Florez v. Northside Studios Inc et al
Civil Action No.: 1:24-cv-07091-JRC
Letter-Motion to Adjourn Conference and Extend Deadlines

Dear Honorable Magistrate Judge James R. Cho,

We represent Plaintiff in the above-styled action.

Pursuant to the Court's November 21, 2024 Order [DE#12], the Parties are required to file the Case Management Plan on or before December 12, 2024 in advance of the scheduled initial status conference scheduled for December 17, 2024.

As an initial matter, the Plaintiff and Defendants, are currently in the midst of negotiations, which are currently trending towards a potential settlement in principle. Given that all parties are hopeful that this matter will settle in its entirety, and in further conservation of judicial economy, the Plaintiff on behalf of the parties requests that the Court grant an adjournment of the initial status conference, and in lieu, enter the proposed Case Management Plan with any other amendments the Court deems proper.

For these reasons, Plaintiff requests the Court grant an adjournment of the initial status conference and its associated deadlines so that the Parties may finalize the negotiations of a Settlement in Principle. This extension will not affect any other deadlines or events in this case.

Thank you for your time in considering this request.

Most Respectfully,

BARDUCCI LAW FIRM



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Maria-Costanza Barducci Esq.

cc: Via CM/ECF Only